Supreme Court, U. S.
FILED
JUL 11 1979
MICHAEL RODAK, JR., CLERK

APPENDIX TO APPELLANT'S BRIEF

In the Supreme Court of the United States

OCTOBER TERM, 1978

No. 78-1143

CYRUS VANCE, SECRETARY OF STATE, APPELLANT

v.

LAURENCE J. TERRAZAS

ON APPEAL FROM THE UNITED STATES COURT
OF APPEALS FOR THE SEVENTH CIRCUIT

JURISDICTIONAL STATEMENT DOCKETED JANUARY 20, 1979
PROBABLE JURISDICTION NOTED MARCH 26, 1979

In the Supreme Court of the United States

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v.

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RELEVANT DOCKET ENTRIES

DATE	PROCEEDINGS
1975	
July 17	File complaint and three copies.
	* * * * *
Oct. 16	Filed defendant's answer.
	* * * * *
1976	
Jan. 15	Filed certified record from Department of State, Operations Branch, Administrative Division, Passport office.
	* * * * *
June 21	Filed deposition of Laverne Terrazas in 2 volumes.
June 23	Filed deposition of Wyatt B. Johson in 1 volume.
July 6	Filed Plaintiff's petition to require production of Wesley Parsons for discovery deposition, and to require detailed answers to interrogatories previously served, and other relief.
	* * * * *
Nov. 30	Filed plaintiff's motion to strike defendant's answer to complaint and for judgment based upon the fifth and fourteenth amendment; attachment.
Nov. 30	Filed plaintiff's objections to government's motion to strike plaintiff's petitioner.
Nov. 30	Filed plaintiff's motion to require production of documents, tape recordings, statements and all investigative records concerning plaintiff.
Nov. 30	Filed plaintiff's alternative motion for protective order.

DATE	PROCEEDINGS
1976	
Dec. 2	Enter order dated 11-30-76: Status report held. Plaintiff's motion for summary judgment is denied. Plaintiff's motion to strike defendant's answer to the complaint is denied. Defendant's motion to strike the plaintiff's motion for summary judgment is denied. Plaintiff's motions for production of documents and for protective order are continued until after the final pretrial order has been filed. Final pretrial order to be submitted on December 14, 1976 at 10:00 A.M.—Marovitz, J. Mailed notices 12-2-76
	* * * * *
1977	
Feb. 16	Enter order dated 2-14-77: Cause called for trial. Opening statements heard and concluded. Evidence heard in part for defendant. Trial adjourned until February 15, 1977 at 10:00 A.M.—Marovitz, J. Mailed notices 2-16-77
Feb. 16	Enter order dated 2-15-77: Trial resumed evidence heard in part for defendant. Trial adjourned until February 16, 1977 at 10:15 A.M.—Mailed notices 2-16-77
Feb. 16	Filed plaintiff's motion for a finding in favor of plaintiff at the close of defendant's evidence.
Feb. 17	Enter order dated 2-16-77: Plaintiff's motion for a finding in favor of plaintiff at the close of defendant's evidence is denied. Marovitz, J. Mailed notices 2-17-77
Feb. 17	Enter order dated 2-16-77: Trial resumed evidence heard and concluded for defendant. Evidence heard in part for plaintiff. Trial adjourned until February 17, 1977 at 8:45 A.M.—Marovitz, J. Mailed notices 2-17-77

DATE	PROCEEDINGS
1977	
Feb. 17	Enter order dated 2-17-77: Trial resumed evidence heard and concluded for plaintiff. Trial briefs conclusion of law and finding of facts to be filed by March 18, 1977. Cause continued for ruling on trial briefs to April 28, 1977 at 10:00 A.M.—Marovitz, J. Mailed notices 2-17-77
	* * * * *
March 18	Enter order dated 3-18-77: Plaintiff's motion to file brief in excess of 28 pages is granted.—Marovitz, J. Mailed notices 3-18-77
	* * * * *
March 29	Filed plaintiff's motion to strike documents and exhibits of the defendant; attachment.
March 30	Enter order dated 3-29-77: Government's motions for leave to file post trial briefs and to file brief in excess of 15 pages is granted. Government's motion to strike certain of plaintiff's exhibits and plaintiff's motion to strike documents and all of defendant's exhibits are continued to April 28, 1977 at 10:00 A.M.—Marovitz, J. Mailed notices 3-30-77
	* * * * *
April 21	Filed Government's motion for leave to file its post trial memoranda, instanter.
	* * * * *
May 2	Filed plaintiff's reply to defendant's brief.
	* * * * *
Aug. 24	Enter order dated August 16, 1977: Enter judgment in favor of defendant. Laurence J. Terrazas is not entitled to the issuance of a United States passport pursuant to 22 U.S.C. § 212 (DRAFT). Marovitz J. JS-6 Notices mailed 8-24-77
	* * * * *

DATE	PROCEEDINGS
1977	
Sept. 2	Filed plaintiff's Notice of Appeal ($5.00 paid) from the final judgment entered on the 16th day of August, 1977.
	* * * * *
Sept. 7	Clerk's File Copy Transcript of Proceedings held before Judge Marovitz February 14 and 15, 1977 filed by official court reporter.
	* * * * *
Nov. 21	Filed Defendant's Exhibit [14] (IMPOUNDED)
1978	
Jan. 3	Certified and transmitted supplemental record on appeal to USCA consisting of defendant's IMPOUNDED exhibit.
Aug. 31	Filed certified copy of order from U.S.C.A. No. 77-2007: Judgment reversed and remanded in accordance with opinion filed.
Aug. 31	Filed Opinion of U.S.C.A.—REVERSED AND REMANDED
	* * * * *
Nov. 22	Enter order dated November 22, 1978: Plaintiff's motion for summary judgment stayed until ruling on pending appeal in the U.S. Supreme Court. November 28, 1978 is stricken for motion for summary judgment. Status hearing set for February 21, 1978 at 10 A.M.—Marovitz, J. Notices mailed 11/24/78

[DEF. EX. 8]

DEPARTMENT OF STATE
DIVISION OF LANGUAGE SERVICES

(TRANSLATION)

LS No. 39937-B

Department of Foreign Affairs
Bureau of Legal Affairs
Nationality Division
Tlatelolco, D.F.

Re: Application for certificate of Mexican nationality.

I hereby respectfully request that I be issued a certificate of Mexican citizenship, on the basis of the facts confirmed by the attached documents, and in accordance with the legal provisions applicable to the case.

I therefore hereby expressly renounce United States citizenship, as well as any submission, obedience, and loyalty to any foreign government, especially to that of the United States of America, of which I might have been subject, all protection foreign to the laws and authorities of Mexico, all rights which treaties or international law grant to foreigners; and furthermore I swear adherence, obedience, and submission to the laws and authorities of the Mexican Republic.

Under oath to speak the truth, I state that I have no title of nobility to renounce, but supposing that, even without my knowledge, I might have the right

to such a title, I hereby formally renounce it, whatever its origin.

I also hereby submit the following data:

Full name of applicant: Laurence James Terrazas Wootton

Marital status: Single

Domicile: Parroquia 731-302, Colonia Del Valle, Mexico, D.F., Zone 12, Mexico.

Place and date of birth: Takoma Park, Montgomery County, Maryland, U.S.A., December 13, 1947.

Father's name and nationality: Carlos Terrazas Navarro. Mexican.

Mother's name and nationality: LaVerne Genevieve Wootton. American.

Mexico, D.F., November 16, 1970

[s] Laurence James Terrazas Wootton
Applicant's signature

[Illegible notation]

I, the Chief of the Division of Nationality and Naturalization of the Bureau of Legal Affairs, Department of Foreign Affairs, certify that this photocopy is a true and faithful copy of the original of the renunciation of United States citizenship made by Mr. Laurence James Terrazas Wootton in this Department on November 16, 1970, which appears in

File VII/521.12(73)/371507. This copy is issued in Tlatelolco, Federal District, on December 5, 1973.

[s] L. Olvera
Leopoldo Olvera

[DEF. EX. 9a]

DEPARTMENT OF STATE
DIVISION OF LANGUAGE SERVICES

(TRANSLATION)

LS No. 39937-B

I, the Under Secretary of Foreign Affairs, certify: That Laurence James Terrazas Wootton is Mexican by birth under the terms of Article 30(A)(II) of the Political Constitution of the United Mexican States, inasmuch as he has proved that he was born on December 13, 1947, in Takoma Park, Montgomery County, U.S.A., to a Mexican father. He has furthermore sworn adherence, obedience, and submission to the laws and authorities of the United Mexican States, and has expressly renounced all rights inherent to any other nationality, as well as all submission, obedience, and loyalty to any foreign government, especially to those which have recognized him as that national.

At the request of the party concerned, whose photograph is affixed to the margin, this certificate is issued in Tlatelolco, Federal District, on April 3, 1971.

[s] R. González S.
Rubén González Sosa

The Director General
of Legal Affairs

Oscar Galeano.

Certificate of Mexican Nationality by Birth No. 1962. Issued to Laurence James Terrazas Wootton. File VII/521.12(73)/371507.

Stamp tax not required in accordance with Article 4(V)(14) of the Schedule of the General Stamp Law.

I, the Chief of the Division of Nationality and Naturalization of the Bureau of Legal Affairs, Department of Foreign Affairs, certify that this photocopy is a true and faithful copy of the duplicate of Certificate of Mexican Nationality No. 1962, issued to Laurence James Terrazas Wootton on April 3, 1971, which appears in File VII/521.12(73)/3715007.

This copy is issued in Tlatelolco, Federal District, on November 28, 1973.

[s] L. Olvera
Leopoldo Olvera

[DEF. EX. 14]

UNITED MEXICAN STATES:)
STATE OF NUEVO LEON)
CITY OF MONTERREY) ss
CONSULATE GENERAL OF THE)
UNITED STATES OF AMERICA)

QUESTIONNAIRE

This Questionnaire will assist the Department of State in making a citizenship determination in your case. When completed it becomes a part of the official records of the United States Government. You are requested to answer the questions to the best of your knowledge and belief. Before furnishing information in this Questionnaire, you may seek the advice of legal or other counsel of your own choice.

NOTE: The word "foreign" as used in this Questionnaire includes any country outside the United States.

1. (a) During your foreign residence, have you previously appeared at a consular office of the United States for any purpose? no If "yes", give date of each appearance, place of such office and purpose of appearance. _____

(b) Have you ever been denied a passport of the United States or registration on the ground that you were not a citizen of the United States?

no If "yes", give date, place and reason for denial. _____

(c) Have you ever applied for a passport or registration as a citizen of the United States for any of your children? no If "yes", give their names and the date, place and result of each application.

(d) When and under what circumstances did you first become aware that you might be a citizen of the United States? I was born in Takoma Park, Maryland, U.S.A. on December 13, 1947, which automatically made me an American citizen.

(e) Have you ever informed any local or national official of a foreign state that you are a citizen of the United States? Yes If "yes", give name and address of such official and the date and circumstances under which he was so informed. Lic. Rubén González Sosa "Subsecretaria de Relaciones Exteiores" in Mexico City, Mexico. I applied for a Certificate of Mexican Nationality in Mexico City, Mexico, which he gave me on April 3, 1971.

2. Have you ever applied for naturalization as a citizen of a foreign state? no If "yes", give the following information:

Date of application _____
Place of application _____
Date of approval by country _____
Nature of document issued _____
Identification or number of document _____

State why you applied for this naturalization and the specific circumstances under which your application was made. _____

_____

_____

Did you intend by this naturalization, to abandon your allegiance to the United States or transfer your allegiance to the foreign state? _____
Explain. _____

_____

_____

3. Have you ever taken an oath or made an affirmation or other formal declaration of allegiance to a foreign state? Yes If "yes", give the following information:

Date April 3, 1971
Place Mexico City, Mexico
Purpose Upon receiving this Certificate of Mexican Nationality I was asked to swear allegiance to Mexico which I did do willingly.

Why did you take the oath or affirmation? Since I had applied for this certificate, I felt that it was my duty to swear such allegiance. I did this because I believe that a person who asks for such a

document has the obligation to swear allegiance to that country. When they gave me this document I voluntarily took this oath. By taking this oath I did not consider that I was relinquishing my rights as an American citizen as far as the United States government was concerned, however, I did swear this oath of allegiance willingly and I was not under any pressures or influences (either mental or physical). This was a voluntary act on my part.

I have always felt allegiance towards both the U.S. and Mexico. My father was a Mexican diplomat and my mother was an American citizen. I consider it natural to love and respect both countries and thus, did not feel it wrong to swear allegiance to Mexico. My father's family was and still is, a very important and famous family in Mexican society. My great grandfather was the owner of the largest cattle ranch in all of Mexico and maybe, the whole world, in 1910. My father was a revolutionary fighter during the Mexican Revolution of 1910. Later on he helped form the strongest political party in Modern Mexico, the "PRI". He was the leader of this party in four states. He was the Secretary of Public Works in Mexico City. He was a member of the House of Representatives. He was the head of the Agricultural Bank of Mexico. He served as Chief of Inspectors during the Second World War. Mexico had 150,000 railroad workers in the U.S. doing

the work of American workers so that they could join the U.S. Army. My father was the head of the Spanish department of the FAO branch of the United Nations. He was the Managing Editor of Encyclopedia Barsa (Britannica in Spanish) and also, had the important job of training engineers from Spain in the use of U.S. road building machinery (this was due to a pact drawn up between the U.S. and Spain. Spain would allow the U.S. to have bases there and the U.S. would give Spaniards technical training). With good reason I loved and respected my father. I hope to continue his way of being. He taught me what was really Mexico. I learned to love Mexico, its customs, way of life. I feel more Mexican than American. I want to stay and live here. I plan on marrying a Mexican girl. I have learned what a great country Mexico is. In a very short time I have become a respected and well thought of person in Mexican society. I have many relatives here who I love. I want to be near them. I feel a part of Mexico. Even my tastes in food are Mexican. I could not live a double life anymore. There comes a time in everyone's life when he has to sit down and decide what he wants to do with his life. I did this and decided that my future happiness was here in Mexico. For that reason I became a Mexican. I do not want anyone, either Mexican or American, to think that for one moment I do not love the United States. I love, respect, and shall always

cherish the fact that I have American blood in my body. I do not plan on ever breaking my ties with the U.S. My father, mother, and sister are there. My old friends are there. I have many wonderful memories of the United States and I sincerely hope that I can return often so that I don't lose contact with everything that I love about the United States. My becoming a Mexican national does not mean in any way, shape, or form, that I am protesting anything. I just happened to have two nationalities and decided that to be truly happy I wanted to become a Mexican citizen. This is not a disloyal act as far as I am concerned. I hope that whoever reads this statement will take into account that I had two nationalities. I had the right to choose. All my life I shall remember the U.S.A. with a great amount of love and respect. If I possible [*sic*] have done wrong, forgive me.

Did you attempt to avoid taking the oath or affirmation? no . If "yes", explain what you did and the name and address of any person having knowledge of your action. _____

If you took no action, explain why you did not. I felt that I was doing what my conscience told me to do. I did not think it wrong. I felt allegiance towards Mexico (I did not stop loving the U.S.A.). Reread statement above.

Did you intend by this oath, or affirmation, to abandon your allegiance to the United States, or transfer your allegiance to the foreign state? No . Explain. I decided that I was going to live in Mexico and I wanted to be a Mexican citizen. I did not think that I was going to lose my American citizenship as far as U.S. law was concerned. This is not the case. I should have realized this, but I didn't. I'm sorry.

4. Have you ever entered or served in the armed forces of a foreign state? no If "yes", give the following information:

Country _____
Date of Entry _____
Branch of Service _____
Date of Discharge _____
Why did you enter foreign Military Service?

_____

_____

Did you try to avoid service? _____ If "yes", explain what you did, and give names and addresses or persons having knowledge of your action.

_____

_____

_____

Did you intend, by this foreign military service, to abandon your allegiance to the United States or transfer your allegiance to the foreign state? _____ Explain. _____

_____

5. Have you ever accepted, served in, or performed the duties of any office, post or employment under the government of a foreign state or political subdivision thereof? no If "yes", give the following information regarding the post, office or employment:

Date employment or appointment began _____
Date terminated _____
Place or places of employment _____
Title of position _____
Name of superior _____
Description of duties _____

_____

Name of Government Organization _____
Was an oath or affirmation of allegiance required for this position or employment? _____

_____

Was your former nationality a prerequisite for this position? _____

Why did you accept this employment? _____

_____

_____

Did you intend, by accepting or performing the duties of this office, post or employment, to transfer your allegiance to the foreign government or abandon your allegiance to the United States? _____ Explain. _____

_____

_____

6. Since December 24, 1952, have you:

(a) sought or obtained registration as a citizen of a foreign country, applied for or obtained a passport, certificate, card, or other document therefrom in which you were described as a citizen of a country other than that of the United States? Yes

(b) held any remunerative post or employment for which foreign nationality was or is a prerequisite? no

(c) been a member of any profession or organization for which foreign nationality was or is a prerequisite? no

(d) claimed any other benefit of your foreign nationality? no

If answer to any of these questions is "yes", give the following information:

Type of document or benefit Card of Identity (Matrícula: #1300).

Date sought May 21, 1966
Date obtained May 21, 1966
Date last used June, 1966

Explain fully why you sought, obtained or used each benefit or document. I intended to travel to Mexico for a vacation and did not want to go as a tourist, but as a Mexican citizen. The card was

obtained on May 21, 1966 at the Mexican Consulate (Chicago, Illinois), where I lived.

Did you intend by seeking or claiming any one of these benefits, to transfer your allegiance to the foreign state or abandon allegiance to the United States? No Explain. I only wanted to come to Mexico as a tourist and did not want to take out a Tourist Card from the Mexican Government. I had no intentions of staying in Mexico permanently at that time.

JURAT

I have (read) (had read to me) the foregoing questions and answers consisting of four pages in the English language and I understand their contents. I also understand that this document becomes a part of the official records of the United States Government; also, that I may seek the advice of legal counsel prior to signing it under oath.

I solemnly swear that the answers and explanations made by me in this questionnaire and in any attachments which are referred to herein are true to the best of my knowledge and belief.

/s/ Laurence James Terrazas
(signature)

"Subscribed and sworn to before me this day of Nov. 15, 1971, 19 . The whole of the above having been first read and explained to the said , who appeared perfectly to understand the same, he signed (or made his mark) in my presence."

/s/ Wesley H. Parsons
WESLEY H. PARSONS
Consul of the United States
Vice Consul of the
United States of America

[Def. Ex. 21-A]

(PLEASE PRINT OR TYPE)

✓ For Department Decision

DEPARTMENT OF STATE

APPLICATION FOR ☐ PASSPORT ☒ REGISTRATION

(Use additional sheets when space provided is not adequate)

POST LOCATION Monterrey, Mexico

POST ACTION

PASSPORT ISSUED
No. ____
Date ____
Expires ____

REGISTRATION APPROVED
Date ____
Expires ____

CARD (CERT.) OF IDENT. & REG.
No. ____
Date ____

☐ $1 Application fee collected
☐ $9 Fee collected
☐ No Fee passport
☐ Official passport
☐ $1 fee collected (for card or cert.)
☐ 48-page passport

A

TO BE COMPLETED BY ALL APPLICANTS

(First name) (Middle name) (Last name)

I Laurence James Terrazas, a citizen of the United States, do hereby apply for (a passport) (registration)

DATE OF BIRTH Month	Day	Year	PLACE OF BIRTH (City, state/province, country)
Dec.	13	'47	Takoma Park, Md., U.S.A.

HEIGHT	COLOR OF HAIR	COLOR OF EYES	SOCIAL SECURITY NO.
5 Ft. 10 In.	brown	brown	355-38-6165

VISIBLE DISTINGUISHING MARKS: none

OCCUPATION: Bus. Admintr.

NOW RESIDING AT: Mexico
Guayana Holandesa 331, Mtry., N.L.

PERMANENT RESIDENCE (Street address, city, state, U.S. ZIP Code) (If same as above, write "Same"): 8036 N. Merrill, Niles, Illinois 60648

MY LAST PASSPORT WAS OBTAINED FROM (Note: If included in another's passport, state name of bearer)

Location of Issuing Office: ____ Date of Issuance: ____

Number: Bearer:
☐ Submitted herewith
☐ Seen and returned
☐ Other disposition (State)

MY LAST REGISTRATION AS A CITIZEN OF THE UNITED STATES WAS APPROVED

Location of Registering Office: ____ Date of Registration: ____

IN THE EVENT OF DEATH OR ACCIDENT NOTIFY (Name in full, relationship, street address, city, state)

Mrs. LaVerne Terrazas (mother) 8036 N. Merrill, Niles, Ill. 60648

HAVE YOU EVER BEEN REFUSED A PASSPORT OR REGISTRATION AS A CITIZEN OF THE UNITED STATES? ☐ Yes ☒ No

IF ANSWER IS "YES", EXPLAIN WHEN AND WHY

B

TO BE COMPLETED BY AN APPLICANT WHO BECAME A CITIZEN THROUGH NATURALIZATION

I IMMIGRATED TO THE U.S. (Month, year)	I RESIDED CONTINUOUSLY IN THE U.S. From (Year) To (Year)	NATURALIZATION CERTIFICATE NO. ☐ Submitted herewith ☐ Seen and returned ☐ Previously submitted

PLACE NATURALIZED (City, state)	NATURALIZATION COURT	DATE NATURALIZED

C

COMPLETE ONLY IF OTHERS ARE TO BE INCLUDED IN PASSPORT OR REGISTRATION AND SUBMIT GROUP PHOTOGRAPH

(WIFE'S) (HUSBAND'S) FULL LEGAL NAME	☐ NATIVE BORN ☐ NATURALIZED	NATURALIZATION CERTIFICATE NO. ☐ Seen and returned

PLACE NATURALIZED (City, state)	NATURALIZATION COURT	DATE NATURALIZED

NAME IN FULL OF CHILDREN INCLUDED	PLACE OF BIRTH (City, state/province, country)	DATE OF BIRTH (Month, day, year)	RESIDED IN U.S. (From-To)
	PASSPORT OFFICE DEC 14 1971		

D

EVIDENCE OF PRIOR DOCUMENTATION OF ABOVE-NAMED PERSONS TO BE INCLUDED (For completion by Consular Office)

NAMES	PASSPORT NO.	DATE OF ISSUE	CANCELED OR OTHER DISPOSITION	DATE OF REGISTRATION OR BIRTH REPORT	LOCATION OF OFFICE
			RECEIVED DEC 16 1971		

E

OTHER EVIDENCE OF U.S. CITIZENSHIP PRESENTED (State disposition)

SEE FS-1765

PASSPORT OFFICE PT/FNS

DEFENDANT'S EXHIBIT 21 A NO.

FORM FS-176 12-67 (OVER - YOU MUST COMPLETE PAGE 2) FORM APPROVED BUDGET BUREAU NO. 47-R0012

21a

FORM FS-176 12-67

F

FATHER'S NAME: Carlos Mariano Terrazas Navarro
FATHER'S COUNTRY OF BIRTH: Mexico
[ ] U.S. CITIZEN [X] NOT U.S. CITIZEN

DATE NATURALIZED: no
PLACE NATURALIZED (City, state):

FATHER'S DATE OF BIRTH: July 10, 1903
[X] FATHER DECEASED [ ] FATHER RESIDING AT
FATHER RESIDED IN U.S. From 1944 To 1970

MOTHER'S MAIDEN NAME: LaVerne Genevieve Wootton
MOTHER'S COUNTRY OF BIRTH: U.S.A.
[X] U.S. CITIZEN [ ] NOT U.S. CITIZEN

DATE NATURALIZED: U.S. birth
PLACE NATURALIZED (City, state):

MOTHER'S DATE OF BIRTH: Sept. 28, 1925
[ ] MOTHER DECEASED [ ] MOTHER RESIDING AT
MOTHER RESIDED IN U.S. From ALWAYS To

G

[X] I WAS NEVER MARRIED
[ ] I WAS LAST MARRIED ON (Date)
PRESENT FULL LEGAL NAME OF HUSBAND OR WIFE: none

HUSBAND'S OR WIFE'S PLACE OF BIRTH (City, state):
HUSBAND'S OR WIFE'S DATE OF BIRTH:
[ ] HUSBAND OR WIFE IS U.S. CITIZEN
[ ] HUSBAND OR WIFE IS NOT U.S. CITIZEN

HUSBAND OR WIFE NOW RESIDING AT:

[ ] MARRIAGE NOT TERMINATED
[ ] MARRIAGE TERMINATED BY [ ] DEATH [ ] DIVORCE ON

H

PROPOSED TRAVEL PLANS

[X] I INTEND TO RETURN TO THE UNITED STATES WITHIN 6 MONTHS
____ YEARS TO [ ] RESIDE [X] VISIT [ ] INDEFINITE
[ ] I NEVER INTEND TO RETURN TO THE UNITED STATES

I INTEND TO CONTINUE TO RESIDE ABROAD FOR THE FOLLOWING REASON
I am living and working in Monterrey, N. L. Mexico and plan to get married within a year.

I

COMPLETE IF RETURNING TO U.S.

PORT OF DEPARTURE:
DATE OF DEPARTURE:
NAME OF SHIP OR AIRLINE:

J

WARNING: Travel to or in countries or areas for which the passport is not valid will result in the withdrawal of passport facilities and may result in prosecution under Section 1544 of Title 18, United States Code.

False statements made knowingly and willfully in passport applications or in affidavits or other documents submitted therewith are punishable by fine and/or imprisonment under the provisions of 18 USC 1001 and/or 18 USC 1542. 18 USC 1543 provides for a fine and/or imprisonment for the alteration or mutilation of a passport issued pursuant to this application. 18 USC 1544 provides for a fine and/or imprisonment for the use of a passport in violation of the restrictions therein.

I have not (and no other person included in the application has), since acquiring United States citizenship, been naturalized as a citizen of a foreign state; taken an oath or made an affirmation or other formal declaration of allegiance to a foreign state; entered or served in the armed forces of a foreign state; accepted or performed the duties of any office, post, or employment under the government of a foreign state or political subdivision thereof; made a formal renunciation of nationality either in the United States or before a diplomatic or consular officer of the United States in a foreign state; ever sought or claimed the benefits of the nationality of any foreign state; or been convicted by a court or court martial of competent jurisdiction of committing any act of treason against, or attempting by force to overthrow, or bearing arms against, the United States, or conspiring to overthrow, put down or to destroy by force, the Government of the United States.

(If any of the above-mentioned acts or conditions have been performed by or apply to the applicant, or to any other person to be included in the passport or registration, the portion which applies should be struck out, and a supplementary explanatory statement under oath (or affirmation) by the person to whom the portion is applicable should be attached and made a part of this application.)

I solemnly swear (or affirm) that the statements made on all the pages of this application are true and that the photograph attached is a likeness of me and of those persons to be included in the passport.

OATH OF ALLEGIANCE

[redacted]

(To be signed at same time by husband/wife to be included in passport)

(To be signed by Applicant in presence of person administering oath)

Subscribed and sworn to (affirmed) before me this NOV 15 1971 day of _____, 19____.

(Seal)

Wesley H. Parsons
Consul ~~Vice Consul of the~~ of the United States at Monterrey, Mexico
United States of America

22a

[Def. Ex. 218]

FORM APPROVED BUDGET BUREAU NO. 47-R0012

DEPARTMENT OF STATE

SUPPLEMENTAL APPLICATION STATEMENT TO BE COMPLETED AS REQUIRED BY CONSUL

- [X] First Time Applicant
- [X] Referred to Department for Decision
- [ ] Marriage Prior to March 3, 1931
- [ ] Resided Outside United States Over 10 Years Since Last Application

(First name) (Middle name) (Last name)

I Laurence James Terrazas a United States citizen, do solemnly swear (affirm) to the following statements.

I CEASED TO RESIDE IN THE UNITED STATES ON OR ABOUT	I DEPARTED FROM THE UNITED STATES ON (Date)
May, 1968	May 13, 1968

I DEPARTED BY [ ] Ship [X] Airline	NAME OF SHIP OR AIRLINE COMPANY	PLACE OF DEPARTURE
X Auto.	I left in my father's car	Laredo, Texas

I HAVE SINCE RESIDED IN THE FOLLOWING COUNTRIES: Mexico

I AM NOW RESIDING IN (Name of country) [X] Permanently [ ] Temporarily

MY REASONS FOR SUCH FOREIGN RESIDENCE ARE
I have been studying in Mexico (business administration). I graduated in June, 1971. I am working here and plany to marry in a year.

DATA ON BROTHERS AND SISTERS, LIVING AND DECEASED

NAME	DATE AND PLACE OF BIRTH	PRESENT ADDRESS
Miss Constance E. Terrazas	March 16, 1951	Chicago, Ill.; 8036 N. Merrill St., Niles, Ill. 60648

IF ANY BROTHERS AND/OR SISTERS HAVE APPLIED FOR A PASSPORT OR REGISTRATION, FURNISH FOLLOWING INFORMATION

NAME	DATE OF APPLICATION	PLACE OF APPLICATION
none		

OTHER REFERENCES IN THE UNITED STATES

NAME	ADDRESS
Miss Dorothy Wootton	6959 N. Ridge Blvd., Chicago, Ill.
Mrs. Irene Schliephake	3836 N. Troy St., Chicago, Ill.

SCHOOLS ATTENDED IN THE UNITED STATES

NAME	ADDRESS	PERIOD OF ATTENDANCE
T. Jefferson Grammar School	Park Ridge, Ill.	1953-1959
East Maine Twp. High School	Park Ridge, Ill.	1961-1965
~~University of Illinois, Chicago Circle, Chicago, Ill.~~	~~1965-1968~~	

BAPTISMAL DATA | CHURCH | ADDRESS
First Methodist Church of Park Ridge (Ill.) 1959

MARRIAGE PRIOR TO MARCH 3, 1931

The following section is to be completed by a woman applicant (or a wife to be included in a passport or registration) who, (1) was previously married before March 3, 1931, and (2) has not been issued or included in a United States passport or registration as a United States citizen abroad since March 3, 1931.

PREVIOUS MARRIAGE TERMINATED BY [ ] Death [ ] Divorce	DATE TERMINATED
NAME OF FORMER HUSBAND (First, middle, last)	PLACE OF HIS BIRTH (City, state)

IF FORMER HUSBAND WAS BORN OUTSIDE OF THE UNITED STATES, COMPLETE ONE OF THE FOLLOWING:

[ ] HE WAS NATURALIZED AS A U.S. CITIZEN ON	PLACE (City, state)	NATU

[ ] HE OTHERWISE ACQUIRED U.S. CITIZENSHIP AS FOLLOWS

[ ] FORMER HUSBAND WAS NOT A U.S. CITIZEN.

I have read (had read to me) the ENGLISH language) the contents of this application and I swear that I understand the statements contained herein.

Laurence James Terrazas
(Signature of Applicant)

DEFENDANT'S EXHIBIT 218 NO.

FORM FS-176S 12-67

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EVIDENCE SUBMITTED	DISPOSITION
Appl's birth certificate issued Aug. 8, 1971.	Attached
Pbtostat of Ident.Card #1300 iss.to appl.on 5-21-66 by Mexican Consulate Chicago, Ill. (orig. seen and returned).	"
Questionnaire and affid. exec. by applicant.	"
Cert.of Loss of Nationality prepared for subject.	"
Affidavit of expatriated person exec. by appl.	"
Certified copy of Certificate of Mexican Nationality.	"

OPINION OF CONSULAR OFFICER

NOTE: The consular officer should cite in his opinion the facts and conclusions required to decide the case. Additional background information may be given here. Use extra pages if necessary.

December 9, 1971

It is the opinion of the consular officer that the subject expatriated himself under Section 349(a)(2) of the Immigration and Nationality Act by voluntarily taking an oath of allegiance to a foreign state and specifically renouncing any claim to his American citizenship in connection with his application for a Certificate of Mexican Nationality. The subject came to the Consulate General to clarify his citizenship status and wishes to receive a definitive statement regarding his loss of nationality.

It is therefore recommended that this application for registration be disapproved.

Wesley H. Parsons

Wesley H. Parsons
American Vice Consul

* GPO : 1968 O - 305-216 (117)

[DEF. EX. 15]

UNITED MEXICAN STATES:	)	
STATE OF NUEVO LEON	)	
CITY OF MONTERREY	)	ss
CONSULATE GENERAL OF THE	)	
UNITED STATES OF AMERICA	)	

To whom it may concern:

I am the son of a Mexican citizen who was sent to the United States by the Mexican Federal Government in 1944. My father was in charge of 150,000 Mexican railroad workers who were working on U.S. railroad lines during the Second World War. My father was stationed at the Railroad Retirement Board offices in Chicago, Ill. It was there that he met my mother. My father's name was Carlos Mariano Terrazas Navarro and my mother's name was LaVerne Genevieve Wootton. My father and mother were married in Indiana in 1947. My father was a very important political leader in Mexico. He was Representative of his native state of Chihuahua in Mexico's House of Representatives. He was lieutenant governor of his home state. He was head of the strongest political party in Mexico (the PRI) in three different states. He was the head of Public Works in Mexico City. He was a personal friend and helped three different Presidents of Mexico (Cardenas, Avila Camacho, and Miguel Aleman). He was the Head of the Spanish speaking department of the F.A.O. branch of the United Nations. He was the founding editor of the Encyclopedia Barsa (Encyclo-

pedia Britannica in Spanish). My father taught me to love and respect Mexico.

I "Laurence James Terrazas" was born in Takoma Park, Maryland, U.S.A. on December 13, 1947. My father after the Second World War, applied for residence in the U.S.A. as a Mexican national; he was granted this permanent residence by the U.S. Immigration and Naturalization Service.

I was brought up in an entirely American atmosphere. I went to Grammar School, Jr. High, High School, and University in the Chicagoland area. I first came to Mexico on my own in 1963. I was 15 years old at the time. I fell in love with Mexico, my Mexican relatives, and the Mexican people on the whole. My father registered me in the Mexican Consulate offices in Chicago as a Mexican citizen, due to the fact that I was his son and he never became a naturalized American citizen. According to international law, he was in his rights.

When I was 18 years old, I registered with my Local Draft Board. I have never tried to break any laws and I consider myself to be a law abiding person. In 1967 and again in 1968, I applied for permission to leave the country to go to Mexico to study. My draft Board gave me this permission. I kept my Draft Board completely informed about my whereabouts and constantly sent them copies of my grades.

For the past 3 years, I have been studying Business Administration in Mexico. In June, 1971, I graduated. Not only did I receive first place amongst my graduating class, but I was also President of the

Student Council. I have just completed giving a summer course to a group of High School students from Sacramento, California, U.S.A., on Mexican History and Culture.

In 1970, I decided that I wanted to stay here in Mexico and live here permanently. I have a great affection for this country and its people. This is not hard to understand, since my father was a citizen of this country and fought during the Mexican Revolution of 1910-1927. I plan on getting married to a Mexican girl within the year. By becoming a Mexican, it will be easier for me to work here. I hope to be able to better relations between both the United States and Mexico. Since I have blood relations on both sides of the Rio Grande, I believe that it is my duty to better the understanding between each country.

On April 3, 1971, I received a Certificate of Mexican Nationality. I took an oath of allegiance to Mexico in Mexico City. Since Mexico and the United States are allies, I didn't believe that I was committing any overt or treasonable act against the United States. Also, since I had dual nationality, I believed that I was within my rights to choose whichever nationality I so sought. This was a voluntary personal act on my behalf and was not forced either physically or mentally into committing this act. I did not believe that by so doing I would lose my rights as an American citizen. However, that is not the case. I am no longer an American citizen according to U.S. laws. This deeply hurts me since I truly love the United States of America. It is a great country

and I do not want my taking out Mexican citizenship to be considered in any way, shape, or form, as a protest movement on my part. I simply felt that my future happiness and success were to be found in Mexico. Since I had a hardship deferment from my Local Draft Board (when my father passed away on November 23, 1970, I applied for a hardship deferment due to the fact that I am the only surviving male member of my immediate family and the only protector of my mother and sister), I did not think that my becoming a Mexican citizen could be taken as a movement towards evading the draft. I considered myself free in that respect. I did not plan to break any U.S. military laws. I have no criminal record, including misdemeanors. I try to respect and obey any and all laws.

I have tried to give you a general idea of my situation so that you will be able to make a just decision regarding my person and citizenship. I do sincerely hope that I shall not be banned from returning to the United States of America as a visitor or possible future immigrant. I have never consciously done anything against the U.S. government and I do hope that my clean record will help me prove to you that all I have said about my respect and affection for the U.S.A. is the whole truth.

I want to avoid, as much as possible, having any black marks placed in front of my name as far as the United States government is concerned. I have always tried to obey U.S. laws to the best of my ability and to the fullest extent. I wish to keep up

this record that I have so carefully tried to maintain. I hope that my decision to become a Mexican citizen does not mean that the U.S. government considers me to be an undesirable person. I hope that my family does not have to suffer because of my decision. They in no way influenced my decision. If some overt act has been committed, I accept the blame. I did not knowingly offend the U.S. government, and hope that this fact shall be taken into account when you pronounce your final decision in my case. Thank your for allowing me to express the facts as far as my side is concerned. Any further information that you shall need, I will gladly give you upon such request.

I swear that all the above information is the whole truth and nothing but the truth, so help me God.

Yours truly,

/s/ Laurence James Terrazas
LAURENCE JAMES TERRAZAS
Sworn and subscribed to
before me this Nov. 15, 1971

/s/ Wesley H. Parsons
WESLEY H. PARSONS
Vice Counsul of the
United States of America

[DEF. EX. 6]

UNITED MEXICAN STATES:)
STATE OF NUEVO LEON)
CITY OF MONTERREY) ss
CONSULATE GENERAL OF THE)
UNITED STATES OF AMERICA)

I, Laurence James Terrazas, solemnly swear that I acquired United States nationality by virtue of birth at Takoma Park, Maryland on December 13, 1947.

That I took an oath of allegiance to Mexico in connection with a Certificate of Mexican Nationality issued to me on April 3, 1971 at Mexico, D.F., Mexico.

I further swear that the act mentioned above was my free and voluntary act and that no influence, compulsion, force, or duress was exterted upon me by any other person, and that it was done with the intention of relinquishing my United States citizenship.

I have read the foregoing statement in the English language and I understand its contents.

/s/ Laurence James Terrazas
LAURENCE JAMES TERRAZAS

Subscribed and sworn to before me this 15th day of November 1971.

/s/ Wesley H. Parsons
WESLEY H. PARSONS
American Vice Consul

[DEF. EX. 5]

DEPARTMENT OF STATE

FOREIGN SERVICE OF THE
UNITED STATES OF AMERICA

CERTIFICATE OF LOSS OF
NATIONALITY OF THE UNITED STATES

This form is prescribed by the Secretary of State pursuant to Section 501 of the Act of October 14, 1940 (54 Stat. 1171) and Section 358 of the Act of June 27, 1952 (66 Stat. 212)

DEPARTMENT OF STATE

—Dec. 21, 1971

CERTIFICATE APPROVED
Director Passport Office

Consulate General of the United States of America at Monterrey, Mexico ss:

I, Wesley H. Parsons, hereby certify that, to the best of my knowledge and belief, Laurence James Terrazas was born at Takoma Park, Montgomery County, Maryland, on December 13, 1947.

That he resided in the United States; 1947-May 1968.

That he resides at Guayana Holandesa 331, Monterrey, Mexico.

That he acquired the nationality of the United States by virtue of birth in the United States of America;

That he acquired the nationality of Mexico by virtue of birth in the United States of a Mexican father;

That he took an oath of allegiance to Mexico, a foreign state, in connection with his application for a Certificate of Mexican nationality.

That he thereby expatriated himself on April 3, 1971 under the provisions of Section 349(a)(2) of (the Immigration and Nationality Act).

That the evidence of such action consists of the following:

Documents listed below.

That attached to and made a part of this certificate are the following documents or copies thereof: (1) Affidavit executed by Mr. Terrzas on Nov. 15, 1971. (2) Copy of Certificate of Mexican Nationality No. 1962.

In testimony whereof, I have hereunto subscribed my name and affixed my office —— day of December, 1971.

[SEAL]

/s/ Wesley H. Parsons
WESLEY H. PARSONS
Vice Consul of the
United States of America

☆ U. S. GOVERNMENT PRINTING OFFICE: 1979 295724 15